

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

DENISE MARIE BARTON (MABN 634052)
C. DAVID HALL (CSBN 66081)
Assistant United States Attorneys

450 Golden Gate Avenue, 11th Floor
San Francisco, California 94102
Telephone: (415) 436-6488
Fax: (415) 436-7234
Email: denise.barton@usdoj.gob

Attorneys for Applicant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
SHANNON BLAYLOCK,)
)
Defendant.)

No. CR 07-454 PJH

[Filed July 17, 2007]

SAN FRANCISCO VENUE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)

No. CR 3-08-70552 JCS

[Filed August 20, 2008]

DAPHENE MCKENZIE VICKERS,)
a/k/a California Slim, Terri,)
Daphene Johnson, Daphene Blaylock,)
)
Defendant.)

NOTICE OF RELATED CASE

IN A CRIMINAL ACTION

SAN FRANCISCO VENUE

The United States of America, pursuant to Local Criminal Rule 8-1, hereby
notifies the Court that the two above-captioned criminal cases are related. The more

1 recent charges filed on August 20, 2008 in Case No. CR 3-08-70552 JCS (see
2 Attachment) involve an individual who is alleged to have aided and abetted the same
3 conduct as the defendant Shannon Blaylock is charged with in Case No. CR 07-454 PJH
4 now pending before the Honorable Phyllis J. Hamilton.

5 The Indictment (Case No. 07-454 PJH) relates to conduct by defendant Blaylock
6 and others in the prostitution of a minor, V.S., from February 2007 through March 22,
7 2007, including in various hotel rooms in the Northern District of California. The
8 Complaint relates to defendant Vicker's (Case No. CR 3-08-70552 JCS) actions with
9 defendant Blaylock in the prostitution of a minor, V.S., in various hotel rooms in the
10 Northern District of California from March 10, 2007 through March 22, 2007. Defendant
11 Vickers was arrested on the outstanding arrest warrant on September 10, 2008 and made
12 her initial appearance before the Honorable Margaret Nagle in the Central District of
13 California. She was ordered detained and ordered transported to the Northern District of
14 California forthwith. The United States anticipates seeking an Indictment against
15 defendant Vickers now that she has been apprehended.

16 Based upon these facts, the cases are related within the meaning of Local Rule
17 8-1(b)(1) because they involve the same alleged events and occurrences. Furthermore,
18 the cases are related within the meaning of Local Rule 8-1(b)(2) because, if heard by
19 separate judges, they are likely to entail substantial duplication of labor by the two judges
20 or may create unnecessary expenses.

21 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states
22 that assignment of these cases to a single judge upon indictment of defendant Vickers is

23 //

24 //

25 //

26 //

27 //

28 //

1 likely to conserve judicial resources and promote an efficient determination of each
2 action.

3
4
5
6 DATED: September 11, 2008

Respectfully submitted,

7 JOSEPH P. RUSSONIELLO
8 United States Attorney

9 /s/

10 _____
11 DENISE MARIE BARTON
12 C. DAVID HALL
13 Assistant United States Attorneys
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28